

EXHIBIT B

**INDEX TO ZHP PARTIES' MOTION TO MOTION TO REDACT AND SEAL PORTIONS OF
THE HEARING TRANSCRIPT OF SEPTEMBER 10, 2021 PURSUANT TO LOCAL CIVIL RULE 5.3(g)**

	Material To Be Sealed	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Party in Opposition to Sealing, If Any, And Basis
1.	Hearing Transcript of September 10, 2021	<p>The ZHP Parties request that portions of this hearing transcript be sealed because they describe in detail documents designated “RESTRICTED CONFIDENTIAL.” <i>See</i> Proposed FOF/COL Decl. at ¶¶ 12-13; Dr. Li Decl. ¶8.</p> <p>These documents describe an internal email not intended for external dissemination regarding ZHP’s efforts to optimize its processes for manufacturing irbesartan. <i>See</i> Proposed FOF/COL Decl. at ¶¶ 13-14; Dr. Li Decl. ¶¶ 6-8.</p> <p>The Protective Order entered by the Honorable Judge Kugler on June 26, 2019 (ECF No. 139) specifically allows for confidential treatment of the information contained in the report, and this report was designated “RESTRICTED CONFIDENTIAL” to protect against disclosure. <i>See</i> Proposed FOF/COL Decl. at ¶¶ 3, 15.</p>	<p>The ZHP Parties’ proprietary API process optimization strategies, testing and procedures relative to irbesartan are commercially sensitive, non-public business information. <i>See</i> Dr. Li Decl. ¶8.</p> <p>If disclosed, it would result in significant competitive harm to the ZHP Parties by allowing the ZHP Parties’ direct competitors to implement and benefit from ZHP’s research and development, and testing directed to optimizing irbesartan’s manufacturing processes while the FDA restricts ZHP from exporting its products into the U.S. market, awarding a significant competitive advantage to the ZHP Parties’ competitors and impeding the ZHP Parties’ ability to re-enter the U.S. market following the removal of the import ban. <i>See id.</i> at ¶¶ 9-10.</p>	<p>The ZHP Parties request that portions of this transcript be sealed because they describe in detail internal ZHP emails designated “RESTRICTED CONFIDENTIAL.” <i>See</i> Dr. Li Decl. ¶ 3.</p> <p>There is no less restrictive alternative available or practicable because the ZHP Parties have reviewed and analyzed this transcript in order to specifically identify exactly what information should remain sealed, and seek to seal only the portions of this transcript that discloses the contents of documents designated as “RESTRICTED CONFIDENTIAL.” <i>See</i> Proposed FOF/COL Decl. at ¶ 29.</p>	<p>Plaintiffs have objected to redacting and sealing portions of the Sept. 10 Transcript because they do not believe that confidential treatment is justified under the Protective Order in light of what they describe as a public health interest. <i>See</i> Proposed FOF/COL Decl. at ¶¶ 31-33.</p>